

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**DNV INVESTMENT PARTNERSHIP,
DALE MENARD, S. EUGENE
MATHIS JR., KENNETH A. GRINSPUN,
ADDISON HOLDINGS LLC, AND
CONTEXT DIRECT II, LP,
ON BEHALF OF THEMSELVES AND
ALL OTHERS SIMILARLY SITUATED,**

Plaintiffs,

v.

**SGM HOLDINGS, LLC, SYNDICATED
GEO MANAGEMENT CORPORATION,
RICHARD FEATHERLY,
LAWRENCE FIELD, AND
PREMIER NATURAL RESOURCES, LLC,**

Defendants.

No. 2:14-cv-02232

**JOINT MOTION AND INCORPORATED MEMORANDUM
IN SUPPORT FOR LEAVE TO FILE IN EXCESS OF PAGE LIMITATIONS**

COME NOW Plaintiffs and Defendants (the “Parties”) and respectfully request that this Court grant their Joint Motion for Leave to File in Excess of Page Limitations and enter an order permitting Defendants to file a memorandum of law in support of their combined motions (i) to dismiss for failure to state a claim, (ii) to dismiss for lack of personal jurisdiction, (iii) to change venue, and (iv) to strike jury demand (“Combined Motions”) in excess of the page limitations contained in Local Rule 12.1(a) and permitting Plaintiffs to file a Response to Defendants’ Combined Motions in excess of the page limitations contained in Local Rule 12.1(b). In support of this motion the Parties would state as follows:

1. Plaintiffs' Second Amended Complaint (D.E. 22) was filed May 26, 2014. The Second Amended Complaint is 33 pages long and contains 151 numbered paragraphs, not including numerous subparagraphs.

2. Defendants have until June 20, 2014, to file a response to the Second Amended Complaint, per this Court's Order dated May 23, 2014 (D.E. 21).

3. Counsel for Defendants plans to file the Combined Motions on behalf of Defendants and has communicated this to counsel for Plaintiffs.

4. Rather than filing four separate motions, Defendants intend to file a single, combined motion seeking one or more of the following forms of relief: dismissal of the Second Amended Complaint for lack of personal jurisdiction, dismissal of the Second Amended Complaint for failure to state a claim, change of venue, and striking the jury demand in the Second Amended Complaint. Because of the various forms of relief sought, and the multiple grounds on which each of Defendants' applications is based, Defendants expect their Memorandum in Support to exceed the page limitations contained in Local Rule 12.1(a) for a single motion. Defendants' best estimate is that the Memorandum in Support of the Combined Motions will be in the 50 page range.

5. Plaintiffs and Defendants jointly request that this Court allow Defendants to file a Memorandum in Support of their Combined Motions in excess of the page limitation, and that Plaintiffs also be allowed to file a Response to Defendants' Combined Motions in excess of the page limitation in Local Rule 12.1(b), in order to sufficiently respond to Defendants' Combined Motions.

6. All Parties join in this request, as evidenced by the electronic signatures of counsel for all parties below. Accordingly, there is no opposition to the relief requested in this Motion.

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CERTIFICATE OF SERVICE

The undersigned certifies that on June 12, 2014, a copy of the foregoing **Joint Motion for Leave to File in Excess of Page Limitations** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ J. Bennett Fox, Jr.
J. BENNETT FOX, JR.